

UNITED STATES DISTRICT COURT

for the
District of Oregon
Portland Division

In the Matter of the Seizure of

**SECURITIES COMPRISING 60,690.099
SHARES OF PROGENITY, INC.
(NASDAQ: PROG) AND 1 SHARE OF
SPECTRUM PHARMACEUTICALS,
INC. (NASDAQ: SPPI) HELD IN THE
ROBINHOOD SECURITIES, LLC,
ACCOUNT NUMBER 855530317
BELONGING TO SALWAN WESAM
ADJAJ**

Case No. 3:22-mc-6

**APPLICATION FOR A WARRANT TO SEIZE PROPERTY SUBJECT TO FORFEITURE
BY TELEPHONE OR RELIABLE ELECTRONIC MEANS**

I, Matthew C. Vollans, being duly sworn, do depose and state under penalty of perjury:

I am a Special Agent with the United States Secret Service (USSS), and have reason to believe that certain property, namely:

**Securities comprising 60,690.099 shares of Progenity, Inc. (NASDAQ: PROG) and 1 share of
Spectrum Pharmaceuticals, Inc. (NASDAQ: SPPI) held in the Robinhood Securities, LLC,
account number 855530317 belonging to Salwan Wesam Adjaj,**

is involved in or are traceable to property involved in wire fraud offenses in violation of 18 U.S.C. § 1343 and constitutes, or is derived from, proceeds obtained, directly or indirectly, from wire fraud in violation of 18 U.S.C. § 1343. The property described above is therefore subject to seizure and forfeiture under 18 U.S.C. §§ 981(a)(1), (b), 982(a)(1), and 984, 21 U.S.C. § 853(f), and 28 U.S.C. § 2461.

The facts to support a finding of probable cause for issuance of a Seizure Warrant are as follows:

SEE ATTACHED AFFIDAVIT, incorporated herein.

Attested to by the applicant in accordance with the
requirements of Fed. R. Crim. P. 4.1 by telephone at
4:00 a.m./p.m.

Date: December 30, 2021.

Portland, Oregon

Matthew C. Vollans, Special Agent, USSS
Printed name and title


Judge's signature

HON. JOHN JELDERKS, U.S. Magistrate Judge
Printed name and title

DISTRICT OF OREGON, ss: AFFIDAVIT OF MATTHEW C. VOLLANS

**AFFIDAVIT IN SUPPORT OF AN APPLICATION
FOR SEIZURE WARRANTS**

I, Matthew C. Vollans, being duly sworn, do hereby depose and state as follows:

BACKGROUND OF AFFIANT

1. I am a Special Agent with the United States Secret Service (USSS) and have been employed with the USSS since November 23, 2014. I am currently assigned to the Portland Resident Office, where I am responsible for investigating crimes related to credit, debit, and identity card production and fraud, wire fraud, mail fraud, identity theft, the manufacture and possession of counterfeit currency, and financial crimes involving the use of digital technology. I was trained at the USSS James J. Rowley Training Center in Beltsville, Maryland. My training included, but was not limited to, the investigation of identity theft and fraud, including the manufacture of counterfeit and fraudulent identification documents, and the investigation of financial crimes, including the passing and possession of counterfeit currency, access device fraud, loan fraud, check fraud and the use of schemes to conceal and launder the proceeds of such crimes.

PURPOSE OF APPLICATION

2. This affidavit is being submitted in support of an Application for Seizure Warrants for the contents of the following financial and brokerage accounts (hereinafter “TARGET ACCOUNTS”) held with Robinhood Markets, Inc., or related entities:

- Funds of up to \$21,439.23 in U.S. currency held in the Robinhood Financial, LLC, account number 855530317 belonging to Salwan Wesam Adjaj.

- Cryptocurrency of up to 9.1041358 Bitcoin (BTC) and 78.772867 Ether (ETH), held in the Robinhood Crypto, LLC, account number 855530317 belonging to Salwan Wesam Adjaj.
- Securities of up to 60,690.099 shares of Progenity Inc (NASDAQ: PROG) and 1 share of Spectrum Pharmaceuticals, Inc (NASDAQ: SPPI), held in the Robinhood Securities, LLC, account 855530317 belonging to Salwan Wesam Adjaj.

3. I submit that the property described above constitutes or is derived from proceeds traceable to wire fraud in violation of Title 18, United States Code, Section 1343. The property described above and held with the subsidiaries of Robinhood Markets, Inc., is therefore subject to seizure pursuant to 18 U.S.C. § 981(b) and 21 U.S.C. § 853(f) and is forfeitable pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461.

4. The information set forth in this affidavit consists of information I have gathered and observed firsthand through the course of this investigation to date, as well as information I have obtained from briefings by other law enforcement personnel, witnesses' statements, and various financial records. The information in this affidavit is not intended to detail each and every fact and circumstance of the investigation or all information known to me or all the participants involved in the investigation. Rather, this affidavit serves solely to establish that probable cause exists in support of the attached Application for Seizure Warrants.

SUMMARY OF THE INVESTIGATION AND PROBABLE CAUSE

5. On May 11, 2021, the proceeds of Small Business Administration ("SBA") Restaurant Revitalization Fund ("RRF") grant number 79132989-07 ("SUBJECT GRANT 1") in

the amount of \$1,685,677.00 were deposited in US Bank account number 153699641111 (“SUBJECT BANK ACCOUNT 1”), which was controlled by Salwan Wesam Adjaj (“Adjaj”).

6. SUBJECT GRANT 1 was made for the benefit of a purported catering business owned and operated by Adult Identity-Theft Victim #1 (“AV-1”), a Florida resident. Application documents submitted for SUBJECT GRANT 1 list personal identifiers associated with AV-1, except for a phone number and bank account belonging to Adjaj. Neither Adjaj nor AV-1 have any apparent involvement in the food-services industry.

7. On May 13, 2021, the proceeds of SBA RRF grant number 11100090-03 (“SUBJECT GRANT 2”) in the amount of \$2,660,198.00 were deposited in JP Morgan Chase account number 717776295 (“SUBJECT BANK ACCOUNT 2”) in the name of Salwan Adjaj, DMD, PC.

8. Like SUBJECT GRANT 1, SUBJECT GRANT 2 was also made for the benefit of a purported catering business. This business was putatively owned and operated by Adult Identity-Theft Victim #2 (“AV-2”), also a Florida resident. Application documents submitted for SUBJECT GRANT 2 list personal identifiers associated with AV-2, except for a phone number and bank account belonging to Adjaj. Neither Adjaj nor AV-2 has any apparent involvement in the food-services industry.

9. Adjaj opened account number 855530317 with Robinhood Markets, Inc. (“Robinhood”) on May 15, 2021. Robinhood is an American financial services company headquartered in Menlo Park, California, that offers a mobile application and website that offer customers the opportunity to invest in stocks, options, and other financial instruments like cryptocurrency through its subsidiaries Robinhood Financial, LLC, Robinhood Crypto, LLC, and Robinhood Securities, LLC.

10. According to records provided by Robinhood, on May 18, 2021, SUBJECT BANK ACCOUNT 1 was added to Adjaj's Robinhood profile, allowing transfers between the accounts. Those same records indicated that SUBJECT BANK ACCOUNT 2 was added to Adjaj's Robinhood profile on May 16, 2021.

11. The TARGET ACCOUNTS held with Robinhood were funded with \$1,092,100.00 in deposits from SUBJECT BANK ACCOUNT 1 and SUBJECT BANK ACCOUNT 2 between May 16, 2021 and September 22, 2021 as detailed below:

Source	Amount	Type	Date/Time
*6295	\$50,000.00	Deposit	09/22/2021, 17:29:30
*6295	\$50,000.00	Deposit	09/20/2021, 18:44:28
*6295	\$50,000.00	Deposit	09/07/2021, 13:05:53
*6295	\$50,000.00	Deposit	08/31/2021, 02:11:38
*6295	\$50,000.00	Deposit	08/20/2021, 00:42:44
*1111	\$100.00	Deposit	08/10/2021, 14:18:50
*6295	\$50,000.00	Deposit	08/06/2021, 15:46:32
*6295	\$50,000.00	Deposit	08/04/2021, 00:38:28
*6295	\$50,000.00	Deposit	08/02/2021, 16:45:24
*6295	\$50,000.00	Deposit	07/30/2021, 11:53:33
*6295	\$50,000.00	Deposit	07/27/2021, 16:52:55
*6295	\$50,000.00	Deposit	07/24/2021, 16:45:36
*6295	\$50,000.00	Deposit	07/22/2021, 13:32:07
*6295	\$40,000.00	Deposit	07/18/2021, 20:59:31
*1111	\$2,000.00	Deposit	07/18/2021, 20:58:17
*6295	\$50,000.00	Deposit	06/10/2021, 13:59:03
*1111	\$50,000.00	Deposit	05/27/2021, 13:16:03
*1111	\$50,000.00	Deposit	05/26/2021, 14:09:05
*1111	\$50,000.00	Deposit	05/25/2021, 13:53:45
*1111	\$50,000.00	Deposit	05/22/2021, 13:11:27
*1111	\$50,000.00	Deposit	05/21/2021, 12:06:40
*1111	\$50,000.00	Deposit	05/20/2021, 13:06:16
*1111	\$50,000.00	Deposit	05/18/2021, 12:27:18
*6295	\$50,000.00	Deposit	05/16/2021, 14:26:13

12. As of December 8, 2021, Robinhood has frozen the remaining assets in the TARGET ACCOUNTS. This includes \$21,439.23 in U.S. currency, 9.1041358 Bitcoin (BTC), worth approximately \$433,230.32, 78.772867 Ether (ETH), worth approximately \$297,475.49, 60,690.099 shares of Progenity, Inc. (NASDAQ: PROG) worth approximately \$120,773.30, and 1 share of Spectrum Pharmaceuticals, Inc. (NASDAQ: SPPI), worth approximately \$1.33. The total approximate value of the TARGET ACCOUNTS as of December 28, 2021, is \$872,919.67.

13. Adjaj is a dentist. He registered the business entity Salwan Adjaj, DMD, PC, with the Oregon Secretary of State on March 6, 2006.

14. Until August 2020, Adjaj was practicing in Oregon under the business name Creekside Endodontics. On August 7, 2020, the Oregon Board of Dentistry voted unanimously to issue an Order of Immediate Emergency License Suspension for Adjaj. Oregon State law dictates that a dentist may not practice dentistry in the state without a license in good standing issued by the Oregon Board of Dentistry. As of October 17, 2021, a public database showed that Adjaj's dental license remained suspended.

15. The application for both SUBJECT GRANT 1 and SUBJECT GRANT 2 was submitted to the SBA's servers in Denver, Colorado, where a payment file was created and sent on to US Treasury servers in Kansas City, Missouri, for payment processing. The internet protocol ("IP") address 71.237.252.127 was used for both applications.

16. Comcast records show that IP address 71.237.252.127 was registered to Adjaj at his business location in Clackamas, Oregon.

17. The SBA Office of Inspector General (OIG) has linked 44 fraudulent applications for COVID-relief loans and grants funded or guaranteed by SBA to Adjaj through one or all of the following factors: Adjaj's name, phone number, email address, or IP address 71.237.252.127.

All of the applications were submitted since Adjaj's license was suspended and he was effectively unemployed. The applications solicited at least \$131,799,794.00 in SBA funds or guarantees and yielded at least \$11,427,795.00 in criminal proceeds.

18. Adjaj was arrested on October 15, 2021, pursuant to a warrant and criminal complaint signed by Magistrate Judge Youlee Yim You in U.S. District Court for the District of Oregon case number 3:21-MJ-00201. That complaint charges Adjaj with Wire Fraud and Aggravated Identity Theft.

19. The remaining balance of SUBJECT BANK ACCOUNT 1 in the amount of \$83,451.93 was seized pursuant to a federal seizure warrant signed by Magistrate Judge Stacie Beckerman on October 27, 2021.

20. SUBJECT BANK ACCOUNT 2 and affiliated JP Morgan Chase accounts controlled by Adjaj, with total balances of \$270,786.61, were also seized pursuant to a federal seizure warrant signed by Magistrate Judge Stacie Beckerman on October 27, 2021.

CONCLUSION

21. Based on the information contained in this affidavit and my investigation to date, there is probable cause to believe, and I do believe, that the currency, cryptocurrency and securities described above constitute or are derived from proceeds traceable to violations of Title 18, United States Code, Section 1343.

22. The currency, cryptocurrency, and securities described above are therefore subject to seizure pursuant to 18 U.S.C. § 981(b) and 21 U.S.C. § 853(f) and are forfeitable pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461.

23. By reason above, I respectfully request that the Court issue a seizure warrant for:

- Funds of up to \$21,439.23 in U.S. currency held in the Robinhood Financial, LLC, account number 855530317 belonging to Salwan Wesam Adjaj.

- Cryptocurrency comprising 9.1041358 Bitcoin (BTC) and 78.772867 Ether (ETH) held in the Robinhood Crypto, LLC, account number 855530317 belonging to Salwan Wesam Adjaj.

Securities comprising 60,690.099 shares of Progenity, Inc. (NASDAQ: PROG) and 1 share of Spectrum Pharmaceuticals, Inc. (NASDAQ: SPPI) held in the Robinhood Securities, LLC, account number 855530317 belonging to Salwan Wesam Adjaj.

24. This affidavit has been reviewed by Assistant United States Attorney Ryan W. Bounds, who has advised me that, in his opinion, there is probable cause to seize the currency from the TARGET ACCOUNTS as identified above.

By Telephone

MATTHEW C. VOLLANS
Special Agent
U.S. Secret Service

Sworn in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone at 4:00
a.m./p.m. on December 30, 2021

John Jelderks

HON. JOHN JELDERKS
United States Magistrate Judge